

# THE WEITZ LAW FIRM, P.A.

Bank of America Building  
18305 Biscayne Blvd., Suite 214  
Aventura, Florida 33160

March 18, 2020

## VIA CM/ECF

Honorable Judge Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street - Courtroom 14C  
New York, New York 10007

**Re: Benedetto v. AINSPH, LLC d/b/a The Ainsworth, et al.  
Case 1:18-cv-07575-PAC**

Dear Judge Crotty:

The undersigned represents the Plaintiff in the above-captioned case matter.

Due to the ongoing health crisis caused by the COVID-19 pandemic, and the tumultuous economic effects it is causing to virtually all businesses open to the public (including possible complete closures), such as the business involved in this matter, Plaintiff's undersigned counsel hereby respectfully requests that the Court grant a thirty (30) day stay of all deadlines and/or Conference in this matter.

Further, since undersigned counsel is based in Florida, an in-person Conference would require possible unsafe roundtrip travel from Florida to New York (in both of which official states of emergency has been declared). In fact, recently a passenger on a similar JetBlue flight from New York to Florida had tested positive for COVID-19. In addition, undersigned counsel suffers from an underlying asthmatic-type health condition which, potentially, would be adversely affected by the COVID-19 virus. However, in the event that the Court decides not to stay this matter, then, in the alternative, undersigned counsel respectfully requests that any future Conference be conducted telephonically, which is in accordance with SDNY's Chief Judge Coleen McMahon's recent March 13, 2020 Standing Order that "Judges are strongly encouraged to conduct court proceedings by telephone or video conferencing where practicable."

The Court may wish to note that this is undersigned counsel's first request to stay this matter. Thank you for your consideration of this unexpected, but essential, request.

A status conference to discuss Plaintiff's request to stay the action is scheduled for March 27, 2020 at 11:30 a.m. The conference will proceed by telephone. The parties are directed to dial into the Court's teleconference number at 888-251-2909, Access Code 2123101, and to follow the necessary prompts.

SO ORDERED. 3/24/2020.

Sincerely,

By: /s/ B. Bradley Weitz  
B. Bradley Weitz, Esq. (BW 9365)  
THE WEITZ LAW FIRM, P.A.  
18305 Biscayne Blvd., Suite 214  
Aventura, Florida 33160  
Tel.: (305) 949-7777  
Fax: (305) 704-3877  
Email: bbw@weitzfirm.com



LEWIS J. LIMAN  
United States District Judge